

Earlier this year, you acceded to the utility industry by citing potential interference to and from unlicensed power company PLC power-grid control systems in turning down ARRL's petition for a 136 kHz allocation. ARRL asked that hams be permitted to transmit on 136 kHz at less than 2 W effective isotropic radiated power (EIRP); the FCC proposed 1 W EIRP.

Now, you and the power industry, together with BPL manufacturers, contend that at HF and VHF, where the power lines are better antennas than they are at LF, that BPL can co-exist with amateur stations using more than 10,000 watts EIRP. Both arguments cannot be valid. There seems to be little evidence that the proposed "Broadband Over Powerlines" (BPL) will not cause pollution of the RF spectrum with noise levels detrimental to normal radio communications from the AM broadcast band through several lower TV channels. Indeed, the only study results available were done quickly during a demonstration of BPL, and they proved completely disruptive over a wide range of frequencies. Having read many of the technical studies and field reports, both here in the US and in other countries, it is obvious that BPL, in any form, is a looming disaster for all parties concerned. The power industry would invest huge sums of money to deploy this technology, yet be able to only offer substandard service. Amateurs unfortunate enough to live in areas where this technology is deployed would lose the use of virtually the entire HF and low VHF spectrum. On behalf of all concerned, I strongly urge that you take NO ACTION that would enable this technology to pollute our national resources.